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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**ELIZABEL HERNANDEZ, ELIDA  
CALDERON, and FAIR HOUSING OF  
MARIN, a Not-for-Profit Corporation,**

**Plaintiffs,**

**vs.**

**VICTOR JUAN UNTIVEROS and 4TH  
& ELM, LLC,**

**Defendants.**

**Case No. 15-cv-04523-KAW**

**JOINT APPLICATION AND  
STIPULATION TO EXTEND DEADLINE  
TO AMEND UNTIL AFTER  
MEDIATION; ~~PROPOSED~~ ORDER**

Pursuant to Local Rules 6-2 and 7-12, plaintiffs and defendant 4th and Elm LLC, by and through their counsel of record, hereby apply for and stipulate to a brief extension of the deadline to amend the pleadings in this case through April 29, 2016. The current deadline is March 31, 2016, as set forth in the Court's minute order dated January 12, 2016 (ECF 24). This is the first request of any party for an extension of time. No other dates or deadlines will be affected by this brief extension.

There is good cause to grant this brief extension of time.

**JOINT APPLICATION AND STIPULATION TO EXTEND DEADLINE TO AMEND UNTIL AFTER  
MEDIATION; [PROPOSED] ORDER - Case No. 15-cv-04523-KAW**

1           First, it is based on the stipulation of counsel.

2           Second, the parties seek this extension because they are currently preparing for a  
3 mediation session through the Court's ADR Department. That mediation is scheduled to take  
4 place on April 14, 2016.

5           Third, if the parties are unable to reach a resolution at the mediation, plaintiffs intend to  
6 act diligently to amend the complaint to name the new owners of the subject property as  
7 defendants in the case. The proposed deadline is 15 days following the mediation.

8           Fourth, this litigation is still in the early stages of discovery, and no other dates or  
9 deadlines will be affected by this extension. The Court has not scheduled a trial date. Other than  
10 the further CMC, scheduled for April 26, 2016, the only date set by the Court thus far is the last  
11 day to amend.

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**JOINT APPLICATION AND STIPULATION TO EXTEND DEADLINE TO AMEND UNTIL AFTER  
MEDIATION; [PROPOSED] ORDER - Case No. 15-cv-04523-KAW**

1 For all of the foregoing reasons, the parties request that the court issue the order below  
2 granting an extension of time to amend the pleadings through April 29, 2016.

3 So stipulated.

4 *I, Liza Cristol-Deman, hereby attest that all signatories whose names appear below have*  
5 *consented to the filing of this document.*

6 Respectfully submitted,

7 BRANCART & BRANCART

8 Dated: March 30, 2016

9 /s/ Liza Cristol-Deman  
10 Liza Cristol-Deman  
Attorney for All Plaintiffs

11  
12 Dated: March 30, 2016

FAIR HOUSING OF MARIN

13 /s/ Casey Epp  
Casey Epp  
Attorneys for All Plaintiffs

14  
15  
16 Dated: March 30, 2016

STRATMAN, PATTERSON & HUNTER

17 /s/ P. Richard Colombatto  
18 P. Richard Colombatto  
Attorneys for Defendant 4th & Elm, LLC

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20  
21 ~~PROPOSED~~ ORDER

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23  
24 Dated: 4/5/16.

25  
26 Kandis Westmore  
27 Hon. Kandis A. Westmore  
U.S. Magistrate Judge

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JOINT APPLICATION AND STIPULATION TO EXTEND DEADLINE TO AMEND UNTIL AFTER  
MEDIATION; [PROPOSED] ORDER - Case No. 15-cv-04523-KAW